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[Attorneys for additional parties in signature block]

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

COLLEEN STROEDER,	Case No. 3:19-cv-01181-HZ
Plaintiff,	
v .	
SERVICE EMPLOYEES INTERNATIONAL UNION LOCAL 503, OREGON PUBLIC EMPLOYEES UNION; KATE BROWN, in her official capacity as governor of OREGON; PAUL MATHER, in his official capacity as acting director of the Oregon Department of Transportation; and KATY COBA, in her official capacity as director of the Oregon Department of Administrative Services,	**JOINT STIPULATED MOTION AND [PROPOSED] ORDER TO CONTINUE STAY OF CASE**
Defendants.	

WHEREAS, on December 10, 2019, the Ninth Circuit Court of Appeals heard oral argument in *Belgau v. Inslee*, Ninth Cir. Case No. 19-35137;

WHEREAS, on December 17, 2019, the parties in this case filed a Joint Stipulation and Motion requesting that the Court issue an order staying all further proceedings until the Ninth Circuit issues a decision in *Belgau* (Dkt. 33);

WHEREAS, on December 19, 2019, the Court granted the Joint Stipulation and Motion and ordered this case stayed for 90 days, until March 18, 2020 (Dkt. 34);

WHEREAS, on March 18, 2020, the parties in this case filed a Second Joint Stipulation and Motion for stay pending a decision in *Belgau* (Dkt. 36);

WHEREAS, on March 20, 2020, the Court granted the Second Joint Stipulation and Motion and ordered this case stayed for 90 days, until June 18, 2020 (Dkt. 37);

WHEREAS, the Ninth Circuit has not yet issued a decision in *Belgau*;

WHEREAS, to conserve party and judicial resources and most efficiently resolve this case, the parties agree that further proceedings in this case should continue to be stayed until the Ninth Circuit issues a decision in *Belgau v. Inslee*, Ninth Cir. Case No. 19-35137, so the parties and the Court will have the benefit of that decision in seeking to resolve the remaining issues in this case; and

WHEREAS, the parties further agree that continuing the current stay of this case until the Ninth Circuit issues a decision in *Belgau* is appropriate given the current COVID-19 public health crisis;

THEREFORE, the parties, through their respective counsel, stipulate and request that the Court order that all further proceedings in this case continue to be stayed until the Ninth Circuit issues a decision in *Belgau v. Inslee*, Ninth Cir. Case No. 19-35137, at which point the parties will

promptly inform the Court of the issuance of that decision and request to schedule a Rule 16

Conference.

So stipulated,

Dated: June 16, 2020   By: /s/ Matthew J. Murray
                                      Matthew J. Murray

                                SCOTT A. KRONLAND
                                MATTHEW J. MURRAY
                                Altshuler Berzon LLP

                                JAMES S. COON
                                Thomas, Coon, Newton & Frost

                                Attorneys for Defendant SEIU Local 503, OPEU

Dated: June 16, 2020   By: /s/ Brian K. Kelsey
                                      Brian K. Kelsey

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                                Attorneys for Plaintiff

[PROPOSED] ORDER

It is so ORDERED.

Date: _____

                                    _____

                                    Hon. Marco A. Hernandez
                                    United States District Judge